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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

DELPHI CORPORATION, et al., : Chapter 11

Case No. 05-44481-rdd

Debtors. : Jointly Administered

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NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears as counsel for Nissan North America, Inc. ("Nissan"), a party-in-interest in the above-captioned case. Pursuant to Sections 102 and 342 of the Bankruptcy Code, Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, request is hereby made that all papers, pleadings, motions, and applications served or required to be served in this case be given to and served upon:

David E. Lemke, Esquire
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and above-specified Sections of the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein.

This is Notice of Appearance and Request for Service of Papers is without prejudice to Nissan's rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the court, and shall not be deemed or construed to submit Nissan to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation Nissan's (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which Nissan is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Nissan expressly reserves.

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October 12, 2005

/s/ David E. Lemke

David E. Lemke, Esq. (*Pro Hac Vice Pending*) Robert J. Welhoelter, Esq. (NY RW8830) WALLER LANSDEN DORTCH & DAVIS, PLLC

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Certificate of Service

The undersigned hereby certifies that a copy of the preceding Notice of Appearance was electronically filed through the Court's ECF system and served this 12th day of October, 2005, by operation of the Court's electronic filing systems.

<u>/s/ David E. Lemke</u>
David E. Lemke, Esq.

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